

Part 2 [to be submitted to local planning authority]

18th March 2024

1. Application Reference

Application number	2023/2671/FUL
Application Details	Hybrid application comprising: A) full application for residential development of 504 homes, community facility, highway, drainage and green infrastructure and associated works and the demolition of identified farm buildings and B) an outline application for a new primary school and associated works http://property.swansea.gov.uk .

2. Summary

This briefing presents the coordinated response from key directorates/departments within Swansea Bay UHB to City & County of Swansea on the following planning application:-

Location	Land To The South Of Glanffrwd Road Pontarddulais Swansea
Nature of development	Hybrid application – residential and primary school
Proposal	As above
Estimation of population increase <i>[if applicable depending on the nature of the development]</i>	Not known

3. Public Health and Wider Determinants of Health

Swansea Bay University Health Board has committed to becoming a population health focused organisation. We have a corporate responsibility for the health and wellbeing of our population, not only those who we see through routine or clinical practice. On 30th March 2023 our Board approved “A Better Future for All: Swansea Bays Population Health Strategy”.

In our Population Health Strategy, we advocate for systemic action on the building blocks for better health and wellbeing in the population, and reducing inequalities in health. Securing a healthy standard of living for all, including secure high-quality housing and income security, and developing healthy and sustainable places and communities are priority objectives for our joint ambition to work with partners to prevent ill health, reducing inequalities and improving health and wellbeing in our population.

Population health is strongly impacted upon through the environment, buildings, street design, natural spaces, facilities that support social networks and economic opportunities. These are known as wider determinants of health, and are influenced by planning. Substantial health inequalities exist in our communities, and planning and development plays a key role in addressing these inequalities.

This response will focus on some of these determinants in relation to this application and summarises the likely impact of the planning application on both public health issues in the immediate and surrounding areas and also the impact upon local healthcare services.

The majority of the evidence referred to in the comments below is available in the Public Health Wales resources '[Creating healthier places and spaces for our present and future generations](#)' and '[Planning and Enabling Healthy Environments: incorporating a template for planning policy](#)'. ,the Public Health England resource '[Spatial Planning for Health: an evidence resource for planning and designing healthier places](#)', and [Natural Resources Wales](#). Additional links are provided for specific sources of evidence on elements of the response.

<p>Green and blue spaces</p>	<p>The provision of green and blue spaces is important to health and well-being, and there is significant evidence, such as from the European Environment Agency, linking contact with the natural environment with improved health and well-being.</p> <p>Green and blue spaces benefit both the environment, biodiversity and human health. They include formal and informal places for children to play, and places for adults and children to socialise and meet each other. People with good access to green spaces are more likely to be more active, and older adults can improve mobility with physical activity. Evidence indicates that undertaking physical activity in a natural setting also improves mental health outcomes more than physical activity undertaken in an indoor setting. Having access to parks and playgrounds is associated with reduced risk of obesity among young people. Furthermore, well planned green and blue spaces can support health and wellbeing through reducing the risk of flooding, keeping villages cool, dampening noise pollution and supporting wildlife. Natural Resources Wales / Local green spaces (Jan 2024)</p> <p>Disadvantaged groups appear to gain a larger health benefit and have reduced socioeconomic-related inequalities in health when living in greener communities, so greenspace and a greener urban environment can also be used as an important tool in the drive to build a fairer society (Public Health England 2020) Improving access to greenspace: 2020 review (publishing.service.gov.uk).</p> <p>The City and Council of Swansea Local Development Plan states in Chapter 2 the requirements of an integrated placemaking approach that includes a green infrastructure/open spaces/ accessible, useable greenspaces and a play plan . Swansea Local Development Plan 2010-2025.pdf (pg65)</p>
<p>Comment on application</p>	<p>Green spaces should be accessible, safe, well maintained and provide the opportunity for use by differing members of the community, from children to older people, and include people with disabilities or restricted mobility. Green spaces should also support biodiversity and act as green corridors for wildlife.</p> <p>The current application makes reference to green and blue spaces and also play opportunities. The full plan state that 48% of the site will comprise of a meaningful network of green and blue space. We welcome the integrated planning of green spaces and green infrastructure in this housing development and also retaining the current mature treelines which support ecological connectivity.</p> <p>Increasing use of good quality green space for all social groups is likely to improve health outcomes and reduce health inequalities. It can also bring other benefits such as greater community cohesion and reduced social isolation.</p> <p>https://assets.publishing.service.gov.uk/government/uploads/system/uploa</p>

	<p>ds/attachment_data/file/355792/Briefing8_Green_spaces_health_inequalities.pdf (Pg3)</p> <p>From the plan and the map, it is difficult to understand all the play opportunities and social connecting areas other than the stipulated primary green space area which is the designated play provision.</p> <p>However, the landscape strategy is sophisticated and elegant in its design. We also welcome the green infrastructure technology that has been harnessed to ensure some blue infrastructure can be included within the designs.</p>
<p>Recommendations</p>	<p>In order to ensure all sections of the population can benefit from the investment in green and blue spaces we recommend that a comprehensive Health Impact Assessment is carried out on this proposed development to ensure that the green spaces are equitable, inclusive and accessible for both the residents in the new homes and the existing community and provide the full range of benefits such as access to nature, opportunities for physical activity and recreational activities. For example, informal play opportunities for children, spaces for older adults to be physically active but also to rest and socialise, and ensuring that people with disabilities or impairments are able to access the spaces equally.</p>

<p>Walking and cycling</p>	<p>Supporting walking and cycling are crucial elements of enabling people to increase physical activity levels, and therefore benefit their health and wellbeing. Being able to be active in the areas people live, work and have leisure time is key to reducing obesity levels, increasing wellbeing, reducing stress and increasing access to work, education and leisure opportunities. Evidence demonstrates that improving the infrastructure around walking and cycling can lead to health gains including an increase in physical activity, improved mobility among children, adults and older adults, and improvements in weight status and air quality.</p> <p>The Active Travel Act and the Placemaking Charter in Wales both strongly advocate and provide the evidence for the need for good quality routes which are segregated from traffic, well-lit and connect to existing routes and facilities.</p> <p>The City and County of Swansea Policy states in Chapter 2 the requirement for active travel which includes the provision of high quality, safe, convenient and attractive cycling and walking routes, for everyday journeys, which offer good connections to services, jobs and other neighbourhoods.</p>
<p>Comment on application</p>	<p>With the exception of the Pontarddulais active travel link, the cycle route network surrounding the site is limited to ‘on road’ and will be prohibitive for residents to engage with cycling as a mode of active travel for everyday activities. The active travel route improvements outlined in figure 2.8 is a proposal for future developmental work and an aspiration for works to be undertaken within the next 10 years, subject to Welsh Government funding. It is not an indicative development at this stage.</p> <p>There is limited information on how traffic and access to the proposed primary school will be managed. It is advocated that the ‘School Streets’ initiative and street infrastructure is planned into the surrounding primary school area to minimise traffic, improve safety and encourage active travel to school. School Streets Initiative - All the information you need</p> <p>The Active Travel Act guidance should inform the design of the cycle/pedestrian pathways on-site – and should be separated.</p>
<p>Recommendations</p>	<p>Comments on what could be amended/added to improve cycling and walking e.g. providing cycle stands in safe, secure and accessible locations, separating cycle and pedestrian routes:</p> <ul style="list-style-type: none"> • Ensure Swansea ‘School Streets’ initiative and associated infrastructure is included within the primary

	<p>school development to avoid congestion, improve pupil safety and encourage active travel.</p> <ul style="list-style-type: none"> • City & County of Swansea to work with the developer to improve the accessibility of surrounding site cycle paths to ensure that site specific cycle routes are meaningful network links and support active travel outside of the development site for everyday activities.
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Food: access to healthy food and the food retail environment (including hot food takeaways)	<p>Having access to healthy food can improve health and well-being. It can support people to maintain a healthy weight and reduce their risk of developing long-term conditions.</p> <p>Availability of healthy food options and the access to it is important to consider with regards to health inequalities. Increased access to unhealthier food retail outlets is associated with increased weight status and unhealthy eating behaviours among children in low income areas.</p> <p>Gardening and community allotments have numerous benefits, such as increasing physical activity, and contributing to better mental health and well-being.</p>
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Comment on application	<p>The Welsh Government (2019) Healthy Weight Healthy Wales Strategy highlights the importance of creating healthy food environments in order to promote health and wellbeing, prevent ill health and major disease burden from overweight and obesity across the population.</p> <p>The planning application does not include any commercial/retail premises. We understand that there are two supermarkets on the main road adjacent to the site as well as cafes.</p> <p>All houses appear to have gardens (though the size is not mentioned). Community allotments and a community orchard are planned in the linear park.</p> <p>In the linear park, a community orchard and community allotments have been built in as community food growing opportunities. (These are not marked on the plan so we can't comment on whether there is sufficient.)</p> <p>Will there be growing space on the school site, preferably outside each classroom? If large enough these could supply the school kitchen..</p> <p>No retail premises included in the application. What is the existing provision, especially near the site of the new primary school?</p>
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Recommendations	<ul style="list-style-type: none"> • Recommend that the responsibility for the maintenance of the community gardens and growing areas is clarified in the proposal. • Consider growing spaces on the school grounds. • Depending on the number of existing hot food take-aways near to school, consider restricting any increase. • Carry out a comprehensive Health Impact Assessment which can ensure equitable opportunities for access to healthy food and food growing are maximised.
Areas for play	<p>Access to places to play is critical for all children in the development of many skills, for exercise and for mental well-being. Increased access to playgrounds and recreational facilities is associated with increased walking among young people. Areas should be provided that are both traditional play areas but also innovative flexible and natural green spaces that enable play to naturally occur. Play spaces do not need to be formal play areas to appeal to children and encourage them to be active and enjoying the outdoors.</p> <p>Policy: Wales: a play friendly country (gov.wales)</p>
Comment on application	<p>Formal play spaces proposed are 1 NEAP; 3 LEAPs; 8 LAPS; 3 kick about pitches; a volleyball pitch; pump track; skate park; basketball court; 1500m & 500m trail running and walking routes with segregated gym equipment; and running track. These cover children of all ages. There is no mention of consideration of access for disabled children. Scope has produced a guide to inclusive playgrounds Campaigning for inclusive playgrounds Disability charity Scope UK</p> <p>Are there informal play spaces in the proposals that enable access to play for a wide range of ages? 6.44 (p.64) states that the POS Assessment concludes that Pontarddulais has an overprovision of Outdoor Sports Facilities and a deficiency in Children’s Playing Space and Equipped Playgrounds within the Ward’s FIT (Fields in Trust?) provision. The PA proposal includes a hilltop park and a linear park, both of which provide informal play spaces.</p>
Recommendations	<p>In order to ensure all sections of the population can benefit from the welcome investment in play space we recommend that a comprehensive Health Impact Assessment is carried out on this proposed development to ensure that the play spaces are equitable, inclusive and accessible for both the residents in the new homes and the existing community and provide the full range of benefits and any unintended consequences can be mitigated.</p>

	We recommend that the needs of disabled children in the play areas are considered Campaigning for inclusive playgrounds Disability charity Scope UK
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Healthy schools	<p>A Health Promoting School actively promotes, protects and embeds the physical, mental and social health and well-being of its community through positive action. This can be achieved by policy, strategic planning and staff development about its curriculum, ethos, physical environment and community relations. Welsh Network of Healthy School Schemes - Public Health Wales (nhs.wales)</p> <p>A whole school approach to the health and well-being of the school community is vital to ensure healthy practices and behaviours are adopted, embedded and impactful. Making Every School a Health Promoting School (who.int)</p>
Comment on application	<p>There is limited information on how traffic and access to the proposed primary school will be managed. Plans show that the current road to the school is via a closed loop road that, if open during school drop off/pick up times, could become very busy with two-way traffic going to and from the school. This presents safety and climate issues. It is advocated that the 'School Streets' initiative and street infrastructure is planned into the surrounding primary school area to minimise traffic, improve safety and encourage active travel to school. School Streets Initiative - All the information you need. Our understanding is that the current Pontarddulais Primary school is introducing the 'School Streets' initiative and so this would be a continuation of a way of working if adopted at the new school site.</p> <p>The proposed school building is two storeys. To allow easy, consistent and regular access to the outdoors during curriculum time each classroom would ideally have doors that lead straight out into the school grounds. This would increase opportunities for outdoor learning. Natural Resources Wales / Increased role for outdoor learning and natural environment in new school curriculum.</p> <p>In addition, does the green space within the school grounds include dedicated allotment/growing areas for the learners? Ideally there would be growing space outside each classroom.</p> <p>The proposed plan of the school grounds does not show any shaded areas (other than from trees). Shaded areas are important during the summer months to allow learners to continue to use outside spaces in a sun safe way.</p>

	<p>The school grounds plan shows a cycle parking area near the school entrance. Will learners using the school active travel access on the opposite side of the school site be able to easily access the cycle parking area? Is an additional cycle parking area required near the school active travel access point also. In addition, will cycle parking be covered to enable all year round use?</p> <p>The plan for the school building does not show whether a dedicated indoor physical activity space is included. A dedicated space either within the school building or separate to it would ensure that hall space does not have to be utilised for multiple purposes.</p> <p>Within the School Travel Plan, point 2.5.3 describes that guidance states new developments should be within 400m walk of a bus stop (IHT). However, point 2.5.4 states that the proposed school site is 600m and 750m walk away from the nearest bus stops. Should new bust stops within the recommended 400m walking distance be considered to encourage bus use?</p>
Recommendations	<ul style="list-style-type: none"> • Ensure Swansea ‘School Streets’ initiative and associated infrastructure is included within the primary school development to avoid congestion, improve pupil safety and encourage active travel. • Either that the school building is all on one floor, or given total capacity for the school is a three-form entry, that all classrooms are on the ground floor. • Consider providing dedicated allotment/growing areas within the school grounds. • Consider shaded areas (canopy’s etc) around the school grounds, in addition to shade from trees. • Consider providing an additional cycle parking area on the opposite side of the school site to the entrance, near the active travel access point. • Consider providing cycle parking that is covered to enable all year round use. • Consider providing a dedicated indoor physical activity space. • Consider new bus stops closer to the proposed new school site, in line with the recommended 400m walking distance (IHT). • Consider completing full HIA to meet health and wellbeing needs of whole school community
Community, health and social care services provided from local facilities	<p>Access to and availability of services provided in good quality, accessible local facilities promotes health and reduces inequalities in health. Having services at the centre of a walkable neighbourhood can also contribute to increasing</p>

	<p>physical activity levels, safer roads and enhanced social connectivity.</p> <p>Access to wider community assets such as education, employment and social activities are also key considerations which will support people’s health and well-being.</p>
Comment on application	<p>Investment in new community assets and infrastructure is as part of the planning application is welcomed and there is the potential for this building to host a range of activities and services that benefit health and wellbeing, social networks and community cohesion.</p> <p>However, there does not appear to be adequate consideration of how this investment in new local facilities could benefit and made easily accessible the existing local community – for example, the Transport Assessment has made the assumption that most traffic towards the facility would be internal to site (6.4.2) and therefore no assessment is visible as to how accessible this facility is to the existing community or the implications of external access to the site. Section 3.3. of the Full Planning Statement notes that the main road access to the development is to be via Tyn Y Bonau Rd and secondary via Glanffrwd Rd. Both of which are not adjacent to the community facility. The community facility is also somewhat distant from the main commercial and residential hub of Pontarddulais as a community.</p> <p>As noted above, no commercial facilities are included in the site, with only two food shops mentioned in the surrounding areas.</p>
Recommendations	<ol style="list-style-type: none"> 1. Further assessment is needed on ensuring that the proposed investment in a new community facility is easily accessible to the whole community, including people who may have limited mobility. 2. Further engagement with health and social services with regards to the planning, design and layout of the community facility to support the delivery of services and activities to meet community wellbeing needs. 3. A comprehensive participatory Health Impact Assessment should be completed to maximise opportunities for benefits to health and wellbeing from the facility and address any unintended consequences.

Building design	<p>Well-designed buildings can improve the well-being, productivity and satisfaction of people working them, and good quality housing can help reduce respiratory conditions, improve mental health and reduce health</p>
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	<p>inequalities. Housing is one of the fundamental building blocks for a healthy life and all aspects of homes, and where people live, affect our physical and mental wellbeing.</p> <p>The provision of affordable housing for vulnerable groups can lead to improved health-related outcomes. Homes that have adequate kitchen facilities, cycle storage and access to outdoor spaces also contribute to overall health and well-being.</p> <p>Furthermore, how homes are built, maintained and how energy efficient they are, brings significant benefits to health while also playing an important part in addressing climate change and the nature emergency.</p>
<p>Comment on application</p>	<p>We welcome the inclusion of cycle storage within the design of flats.</p> <p>Please see notes and recommendations in the following sections:</p> <p>Health inequalities: regarding housing types to meet population need regarding ageing population and the identified local need for more 1 and 2 bedroomed properties that are suitable for “lifetime homes”.</p> <p>Climate change: regarding preventing overheating.</p> <p>While recognising that the full planning statement provides a broad overview of a placemaking approach, there is limited detail in the full planning statement regarding the energy efficiency, and related technology, of the homes in the housing development. There is little information on how the development will seek to maximise home energy performance at low economic, environmental and societal cost. There is reference to an energy assessment to determine the feasibility of incorporating low carbon or renewable energy installations, and district heating networks however, detailed plans are not available to appraise home energy performance and how this will be maximised. The full planning statement refers to the company’s commitment to reducing carbon emissions and their bid to deliver zero carbon societies, but it does not include how this will maximise home energy performance for homeowners.</p>
<p>Recommendations</p>	<p>Please see notes and recommendations in the following sections:</p> <ol style="list-style-type: none"> 1. Health inequalities: regarding housing types to meet population need regarding ageing population

	<p>and the identified local need for more 1 and 2 bedroomed properties.</p> <ol style="list-style-type: none"> 2. Climate change: regarding preventing overheating. 3. A focus on improving the energy efficiency of private sector residences is to be encouraged to reduce emissions, harness the most environmentally appropriate fuel source, minimising the need for retrofitting, and ensuring fuel costs are affordable. Policies from around the world regarding energy efficiency in the home are listed on the International Energy Agency policies database – this provides insight into energy efficiency measures being taken worldwide and can be a starting point for developing any strategy. 4. PHW-The-importance-of-household-energy-efficiency-for-health-1.pdf (phwwhocc.co.uk) 5. International Energy Agency 2021. Policies Database. Available at: https://www.iea.org/policies [Accessed: 21 July 2021].
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Air Quality and Noise	<p>Evidence indicates that living in an area with clean air can lead to positive changes in health behaviours, and exposure to air pollution negatively impacts on health and well-being.</p> <p>Air quality can be improved through green infrastructure, active travel routes, reduction in traffic congestion and emissions.</p> <p>phw.nhs.wales/services-and-teams/knowledge-directorate/research-and-evaluation/publications/making-a-difference-reducing-health-risks-associated-with-road-traffic-pollution-in-wales/</p> <p>Noise has negative impacts on health and well-being. <u>Long term exposure</u> to environmental noise is linked to sleep disturbance, heart disease and premature deaths.</p>
Comment on application	<p>The main concern identified in relation to air quality is that the current road to the school is via a closed loop road that, if open during school drop off/pick up times, could become very busy with two-way traffic going to and from the school and potential for idling cars while they wait to access the drop off point, with no other route available to reduce congestion/disperse traffic.</p>
Recommendations	<p>Further assessment of the proposed current design is recommended with regards to likely school traffic on air quality, noise and road safety on the residences along the</p>

	<p>route to school and the possible role of green infrastructure to mitigate this.</p> <p>Please refer to the section labelled Healthy Schools with regards to additional recommendations and local policy on this.</p>
<p>Inequities and health inequalities</p>	<p>In Swansea there is a 15-year gap in Healthy Life Expectancy between males living in the least and most deprived areas of the County Borough and an almost 20-year gap in healthy life expectancy between females living in the least and most deprived areas. (Public Health Wales, Public Health Outcomes Framework 2018-2020).</p> <p>The Swansea Bay University Health Board Population Health Strategy (2023) commits the Health Board to work in partnership to achieve the “Marmot” policy objectives in order to reduce health inequalities in our region. This includes working with partners to develop “healthy and sustainable places and communities”.</p> <p>High quality, affordable housing has major benefits for health and wellbeing. However, a report by <u>Public Health Wales</u> in 2023 states that <i>“The gap between those who can and cannot afford their housing has increased over the past decade, which is driving increasing differences between the health and well-being of those who are better and worse off in Wales. Those who are unable to afford their homes often face compounding disadvantages. It can lead to people being trapped in poor quality or unsafe housing in neighbourhoods with fewer assets or amenities, or to becoming homeless or put in temporary accommodation, further worsening their health and well-being and widening existing health inequalities in Wales”</i> (Roberts and Petchey, 2024).</p> <p>In 2020, single-adult households (38,900 / 35.5% of total) and 2-person 0-children households (32,200 / 29.4%) were the most common household types in Swansea. Between 2015 and 2020, the number of single-person households increased by 2,400 (+6.6%) (Swansea PSB Wellbeing Assessment 2022).</p> <p>In addition to the current levels of demand and housing need, Swansea’s Local Housing Market Assessment carried out in 2019 showed that between 2018 and 2033 there will be a need of an extra 15,365 units of accommodation with 31% of these being affordable housing. Between 2018 and 2033, it is currently projected that there will be a 28% increase in population aged 65+ and a 58% increase in those aged 80+. This is due to an</p>

	<p>ageing population rather than in migration. Likewise there is a projected decline in numbers in the younger age groups due to out migration. In terms of property type the greatest need will be for 1 and 2 bedroomed properties, this reflects the ageing population with many of those aged 65+ downsizing to smaller properties. (Swansea PSB Wellbeing Assessment 2022).</p> <p>As of 30/9/2021 the Council’s waiting list held 4,639 households: 26% were households who were homeless or threatened with homelessness; 43% were waiting list applicants with other, less severe forms of housing need; 31% were council tenants who have applied for a transfer to another property/area. Demand for social housing remains high and there is insufficient supply to fulfil the needs of all households on the waiting list. (Swansea PSB Wellbeing Assessment 2022).</p>
<p>Comment on application</p>	<p>The Swansea LDP 2010-2025 states a development requirement of 20% affordable housing delivery for the Strategic Development Site in Pontarddulais, and a 15% target for the developments in the Northwest Area . Whilst this is caveated as “subject to financial viability”, the 10% (50 units) presented in the Planning Application represents a 50% reduction on what has been identified in the LDP as the need to deliver local affordable housing units. Therefore, our view is that this development could and should deliver more to address affordable housing and reduce inequalities in housing access and security in the area. A development that does not deliver the full need of the community for affordable housing risks widening inequalities in the area.</p> <p>In particular, due to the rise in an ageing population and more single person households, we suggest that more should be delivered in this development to meet the needs of older adults and single person households. Therefore, more smaller, accessible, energy efficient homes are needed. It is important that the community facility is also fully accessible.</p> <p>In terms of reducing inequalities and promoting community cohesion, it is positive that the affordable housing is integrated throughout the development and that 3 of the 4 affordable house types are also in the open market house range.</p>
<p>Recommendations</p>	<ol style="list-style-type: none"> 1. We recommend that this development should meet the target in the Swansea LDP for affordable housing delivery on the site.

	<p>2. We recommend that both the total housing mix across the site, and that to be delivered in the affordable housing allocation, should provide more 1 bed and 2 bed properties and lifetime homes for older adults.</p> <p>3. We recommended that a comprehensive participatory Health Impact Assessment is undertaken to assess the potential impacts on the health and wellbeing of the population (both for those who may be living in any new development but also the existing community), and also the distribution of these effects across the population. This will aim to identify opportunities to maximise gains for health and wellbeing in the development and ensure that any potential risks to health are minimised. We recommend that the HIA is guided by the guidance developed by the Wales HIA Support Unit, and also meets the criteria in the Quality Assurance Review Framework for HIA published by WHIASU.</p>
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Climate Change	<p>It is recognised that climate change is a major threat to the wellbeing of people and communities in Wales and that long term adaptive action across policy areas is required to protect health and wellbeing (Netherwood, 2021 Climate Change Risk Assessment National Summary for Wales; Edmonds and Green, 2023).</p> <p>Extract from <u>Public Health Wales Climate Change in Wales: Health Impact Assessment</u> Chapter D5.1 Housing (Edmonds and Green, 2023):</p> <p>At current temperatures, one in five of the UK's homes overheat (House of Commons Environmental Audit Committee, 2018). The impact from climate change on overheating in homes and resulting impacts on health and wellbeing, including mortality, is classed as a high magnitude risk in the UK Climate Change Risk Assessment (UK Climate Risk, 2021) (see also Section D5.4).</p> <p>A number of recent studies have modelled the impact of current and future temperatures on homes of different types in Wales (Arup, 2022; Hayles, 2022; Welsh Government, 2020b). The Arup (2022) study identified that at current temperatures around a quarter of homes in Wales have bedrooms that do not meet the criteria for overheating. Modelling in the study identified that at 2° of warming no properties would meet the bedroom overheating criteria and</p>
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	<p>at 4° of warming, the majority of living areas and bedrooms did not meet the criteria. The modelling study by Hayles (2022) also finds that the majority of Welsh dwellings will experience increased incidence of summertime overheating. The least likely to overheat are pre 1919 dwellings and dwellings with solid stone walls. Dwellings built post 1990 dwellings, flats, and properties with internal wall insulation were more likely to overheat (Hayles, 2022).</p> <p>Extract from Public Health Wales <u>Climate Change in Wales: Health Impact Assessment Chapter D5.3 Flooding</u> (Edmonds and Green, 2023):</p> <p>A high-quality longitudinal study in England found that:</p> <ul style="list-style-type: none"> • The risk of having probable depression, anxiety or Post-Traumatic Stress Disorder (PTSD) is approximately six times higher in people whose homes are flooded, than in those who are unaffected (Public Health England, 2017). • The impacts on mental health arising from flooding are associated with the depth of floodwater and length of time a home is flooded (Public Health England, 2017). • The percentage of people with probable depression, anxiety or PTSD was also elevated amongst those whose lives were disrupted by flooding but who did not have floodwater in the liveable part of their homes, although not to the same degree (Public Health England, 2020) <p>Flooding can also cause disruption in access to essential services, including healthcare and education. Disruption to work and education was an important predictor of psychological morbidity linked to flooding (Public Health England, 2020).</p>
<p>Comment on application</p>	<p>We note the response from NRW on flood risk in the Pre-Application Consultation Report dated in December 2023 based on the Development Map for Wales. We also note the current status of the Flood Map for Planning and TAN 15.</p> <p>However, we also note that whilst the development site itself is not physically in a Flood Zone, according to the Development Map for Wales the site is adjacent to a number of areas classed as Zone C2: “Areas of the floodplain without significant flood defence infrastructure”. The Flood Map for Planning which accounts for climate change impacts also indicates that the site is adjacent to and near to on all sides areas within Flood Zones 3 and 2.</p>

	<p>As a result, we highlight that although the physical site location may not be in an identified flood zone, the people living on the development site are likely to be impacted by any flooding in the local area due to their need to travel off site and out of their houses to access essential services such as healthcare, education, employment and shops. Any flood impacts on local roads around and adjacent to the site will impact the population living on the site.</p> <p>As noted above, people whose lives are disrupted by flooding (even if their own homes are not flooded) experience elevated rates of mental health conditions such as anxiety and depression and among those disrupted by flooding but without floodwater in the home, disruption to work and education was an important predictor of psychological morbidity (Public Health England, 2020).</p>
<p>Recommendations</p>	<ol style="list-style-type: none"> 1. Ensure that building design complies with Building Regulations on overheating and ventilation to mitigate increasing temperature linked to climate change: Approved Document O - Overheating (gov.wales) 2. Approved Document F - Ventilation (gov.wales) 3. Liaison with the Local Resilience Forum on the implications for resilience and emergency planning of this major residential development adjacent and near to on all sides a flood risk zones and ensure consultation with WAST (Ambulance).

4. Healthcare Service Provision

The following summarises the likely impact of the planning application on healthcare service provision in the immediate and surrounding areas.

4.1 Primary Care

<p>Primary Care</p>	<p>The area in which the new housing is to be located comes under the remit of the Llŵchwr Cluster within Swansea Bay University Health Board. This Cluster consists of six GP's as follows:</p> <ul style="list-style-type: none"> • Estuary Group (which includes Gowerton Medical Centre, Penclawdd Health Centre and Penybryn Surgery) • Princess Street Surgery • Talybont Surgery • Ty'r Felin Surgery. At present this cluster provides care to a population of around 49,075 in the Pontardulais, Gorseinon, Gowerton and Penclawdd areas of Swansea. <p>In addition to the GP's the cluster is made up of four opticians, seven dental practices, 10 pharmacies and 3 nursing homes.</p> <p>There is also a small health board owned clinic in Pontardulais providing SALT, AAA screening and Dietetics services. The Site is also an office base for the Design to Smile service.</p> <p>Within Pontardulais there is one GP Practice, this is Tal Y Bont Surgery with current practice patient numbers are circa 9461. The practice has raised continuing concerns about capacity.</p>
<p>Comment on application</p>	<p>The GP accommodation is already at capacity and car parking on the site is extremely limited. As a result, it is expected that the impact on the Tal Y Bont surgery will be significant with an increase to the population of this size.</p> <p>Although this new development will affect Tal Y Bont Surgery primarily, all other GP's within Llŵchwr cluster will be impacted particularly as there are substantial housing proposals elsewhere in the cluster area.</p>
<p>Recommendations</p>	<p>Whilst the Tal Y Bont Surgery is owned by the GP and not the Health Board, we understand the Cluster lead has raised concerns during the consultation, although these concerns are not included in any of the engagement documentation</p>

	<p>available.</p> <p>Recommendations:</p> <ol style="list-style-type: none"> 1. Engagement with the GP practice to understand the potential implications for the infrastructure of the GP practice. 2. The design and planning of the community facility should include consideration of Health Board Services including therapy services such as speech and language and dietetics. 3. The Health Board would support the recommendation made by SBUHB Public Health for a Health Impact Assessment to be undertaken to inform future planning of primary care services.
Triggers for provision	N/A
Costs	N/A

Community and Intermediate Care

Community and Intermediate Care	<p>Additional patients within the location would have service wide implications on the Health Board, not just where the new homes are being built. There will be an increased pressure on both school nursing and health visiting due to the increase in children and young people living there.</p>
Comment on application	<p>As described above an increase to the population in this area would have implications and an impact on services such as health visiting and the school nursing team. The type provision would include immunisations and school based vaccinations.</p> <p>In addition, an increase in children & young people would have an impact more generally in Children Services, Child Health and Safeguarding. These services already under considerable pressure and there is a high risk that demand will outweigh capacity.</p>
Recommendations	<ol style="list-style-type: none"> 1. The need for a Health Impact Assessment as recommended by the SBUHB Public Health Team is further re-enforced and must be undertaken to inform future planning of primary care services. 2. The design and planning of the community facility

	should include consideration of Health Board Services including Health Visiting and Immunisations.
Triggers for provision	N/A
Costs	N/A

4.2 Secondary Care

Secondary care	<p>Health Board services are planned on a regional footprint, and the catchment population of Pontardulais will access the following secondary care sites:</p> <ul style="list-style-type: none"> • Morryston Hospital • Neath Port Talbot Hospital • Singleton Hospital
Comment on application	<p>It is difficult to forecast the impact this new development will have on unscheduled and planned care without further detail around the percentage split between homes likely to be occupied by local population already considered within any local modelling, and any additional pressures due to inward migration from outside of the SBUHB footprint.</p> <p>There is already significant demand on resources in all parts of the system including unscheduled & emergency care and planned care. The increase in population will have an impact.</p> <p>In line with the response of the SBUHB Public Health Team more should be done to provide additional affordable housing as part of the development, and supporting the need to reduce inequalities. Homelessness is an increasing issue that is impacting on flow in our hospitals and leading to patients being retained inappropriately in health facilities in addition to impacting on patient recovery through the de-skilling and deconditioning of people so affected. A Health Impact Assessment would mitigate this risk.</p>
Recommendations	<ol style="list-style-type: none"> 1. The need for a Health Impact Assessment as recommended by the SBUHB Public Health Team is further re-enforced and must be undertaken understand the population needs to inform planning of secondary care. 2. The need to further engage with the Welsh Ambulance Service around the risk of increased

	demand.
Triggers for provision	N/A
Costs	N/A

4.3 Mental Health and learning disability

Mental Health and Learning Disability	Health Board services are planned on a regional footprint for Mental Health and Learning Disabilities.
Comment on application	<p>There are no dedicated mental health and learning disability accommodation in the catchment area of Pontardulais, and the population would access services across the Health Board geographic footprint.</p> <p>The recommendations made by SBUHB Public Health Team are further validated by the West Glamorgan RPB Strategy for Emotional and Mental Wellbeing. Welsh Government Policy and supporting policies and legislative frameworks recognise that the causes and effects of poor mental health are complex and multifaceted. It goes beyond focusing on addressing the service challenges such as workforce supply and access to services and seeks to explore the wider issue of well-being of the whole population.</p> <p>Access to green and blue spaces is important to health & wellbeing to encourage exercise and social interaction between all age groups. Any developments should avoid widening health inequities at all costs.</p>
Recommendations	<ol style="list-style-type: none"> 1. The need for a Health Impact Assessment as recommended by the SBUHB Public Health Team is further re-enforced and must be undertaken understand the population needs to inform planning of emotional and mental wellbeing services.
Triggers for provision	N/A
Costs	N/A

5. Summary

It is disappointing that the impact on health services is not considered in this edition of the City & County of Swansea Local Development Plan, and we would strongly encourage our partners to ensure that the Health Board is involved in the next LDP update.

In summary, our recommendations are:

1. In order to ensure all sections of the population can benefit from the investment in green and blue spaces we recommend that a comprehensive Health Impact Assessment is carried out on this proposed development to ensure that the green spaces are equitable, inclusive and accessible for both the residents in the new homes and the existing community and provide the full range of benefits such as access to nature, opportunities for physical activity and recreational activities. For example, informal play opportunities for children, spaces for older adults to be physically active but also to rest and socialise, and ensuring that people with disabilities or impairments are able to access the spaces equally.
2. Comments on what could be amended/added to improve cycling and walking e.g. providing cycle stands in safe, secure and accessible locations, separating cycle and pedestrian routes:
 - Ensure Swansea 'School Streets' initiative and associated infrastructure is included within the primary school development to avoid congestion, improve pupil safety and encourage active travel.
 - City & County of Swansea to work with the developer to improve the accessibility of surrounding site cycle paths to ensure that site specific cycle routes are meaningful network links and support active travel outside of the development site for everyday activities.
3. Recommend that the responsibility for the maintenance of the community gardens and growing areas is clarified in the proposal.
4. Consider growing spaces on the school grounds.
5. Depending on the number of existing hot food take-away near to school, consider restricting any increase.
6. Carry out a comprehensive Health Impact Assessment which can ensure equitable opportunities for access to healthy food and food growing are maximised.
7. In order to ensure all sections of the population can benefit from the welcome investment in play space we recommend that a comprehensive Health Impact Assessment is carried out on this proposed development to ensure that the play spaces are equitable, inclusive and accessible for both the residents in the new homes and the existing community and provide the full range of benefits and any unintended consequences can be mitigated.
8. We recommend that the needs of disabled children in the play areas are considered [Campaigning for inclusive playgrounds | Disability charity Scope UK](#)

9. Ensure Swansea 'School Streets' initiative and associated infrastructure is included within the primary school development to avoid congestion, improve pupil safety and encourage active travel.
10. Either that the school building is all on one floor, or given total capacity for the school is a three-form entry, that all classrooms are on the ground floor.
11. Consider providing dedicated allotment/growing areas within the school grounds.
12. Consider shaded areas (canopy's etc) around the school grounds, in addition to shade from trees.
13. Consider providing an additional cycle parking area on the opposite side of the school site to the entrance, near the active travel access point.
14. Consider providing cycle parking that is covered to enable all year round use.
15. Consider providing a dedicated indoor physical activity space.
16. Consider new bus stops closer to the proposed new school site, in line with the recommended 400m walking distance (IHT).
17. Consider completing full HIA to meet health and wellbeing needs of whole school community
18. Further assessment is needed on ensuring that the proposed investment in a new community facility is easily accessible to the whole community, including people who may have limited mobility.
19. Further engagement with health and social services with regards to the planning, design and layout of the community facility to support the delivery of services and activities to meet community wellbeing needs.
20. A comprehensive participatory Health Impact Assessment should be completed to maximise opportunities for benefits to health and wellbeing from the facility and address any unintended consequences.
21. Please see notes and recommendations in the following sections:
 - Health inequalities: regarding housing types to meet population need regarding ageing population and the identified local need for more 1 and 2 bedroomed properties.
 - Climate change: regarding preventing overheating.
 - A focus on improving the energy efficiency of private sector residences is to be encouraged to reduce emissions, harness the most environmentally appropriate fuel source, minimising the need for retrofitting, and ensuring fuel costs are affordable. Policies from around the world regarding energy efficiency in the home are listed on the International Energy Agency policies database – this provides insight into energy efficiency measures being taken worldwide and can be a starting point for developing any strategy.
 - [PHW-The-importance-of-household-energy-efficiency-for-health-1.pdf \(phwwhocc.co.uk\)](https://www.phwwhocc.co.uk/PHW-The-importance-of-household-energy-efficiency-for-health-1.pdf)
 - International Energy Agency 2021. Policies Database. Available at: <https://www.iea.org/policies> [Accessed: 21 July 2021].
22. Further assessment of the proposed current design is recommended with regards to likely school traffic on air quality, noise and road safety on the residences along the route to school and the possible role of green infrastructure to mitigate this.

23. Please refer to the section labelled Healthy Schools with regards to additional recommendations and local policy on this.
24. We recommend that this development should meet the target in the Swansea LDP for affordable housing delivery on the site.
25. We recommend that both the total housing mix across the site, and that to be delivered in the affordable housing allocation, should provide more 1 bed and 2 bed properties and lifetime homes for older adults.
26. We recommended that a comprehensive participatory Health Impact Assessment is undertaken to assess the potential impacts on the health and wellbeing of the population (both for those who may be living in any new development but also the existing community), and also the distribution of these effects across the population. This will aim to identify opportunities to maximise gains for health and wellbeing in the development and ensure that any potential risks to health are minimised. We recommend that the HIA is guided by the guidance developed by the Wales HIA Support Unit, and also meets the criteria in the Quality Assurance Review Framework for HIA published by WHIASU
27. Ensure that building design complies with Building Regulations on overheating and ventilation to mitigate increasing temperature linked to climate change: [Approved Document O - Overheating \(gov.wales\)](#)
28. [Approved Document F - Ventilation \(gov.wales\)](#)
29. Liaison with the Local Resilience Forum on the implications for resilience and emergency planning of this major residential development adjacent and near to on all sides a flood risk zones and ensure consultation with WAST (Ambulance).
30. Engagement with the GP practice to understand the potential implications for the infrastructure of the GP practice.
31. The design and planning of the community facility should include consideration of Health Board Services including therapy services such as speech and language and dietetics.
32. The Health Board would support the recommendation made by SBUHB Public Health for a Health Impact Assessment to be undertaken to inform future planning of primary care services, understand the population needs to inform planning of secondary care and understand the population needs to inform planning of emotional and mental wellbeing services.
33. The design and planning of the community facility should include consideration of Health Board Services including Health Visiting and Immunisations
34. The need to further engage with the Welsh Ambulance Service in relation to the risk of increase demand.

For further information contact:

Michelle Davies, Head of Strategic Planning & Partnerships

Michelle.I.davies@wales.nhs.uk